

**Before the
Federal Communications Commission
Washington, D.C.**

In the matter of:

Amendment of Sections 74.1203(a)(3) and)	
74.1204(f) of the Commission's Rules to Protect)	RM No. 11786
Local Radio Service Provided by Fill-In Area)	
FM Translators)	

COMMENTS OF GENESEE MEDIA CORPORATION

Genesee Media Corporation ("GMC"), a local broadcaster with broadcast stations in the Rochester, New York radio market, hereby submits these comments in response to the Petition for Rulemaking, Amendment of Sections 74.1203(a)(3) 74.1204(f) of the Commission's Rules to Protect Local Radio Service Provided by Fill-In Area FM Translators, RM No. 11786, pursuant to Public Notice Report No. 3075 dated April 18, 2017. These comments are related to the Commission's recent actions on AM Revitalization, the 13-249 Notice of Proposed Rulemaking [NPRM] of October 31, 2013, and the succeeding First Report and Order, Notice of Proposed Rulemaking (FNPRM), and Notice of Inquiry (NOI), dated October 23, 2015. In those proceedings, the Commission solicited comments from the industry regarding specific proposals on enhancing the AM radio service.

Unlike FM signals, AM broadcast signals often feature sizably different daytime and nighttime coverage patterns. The extreme case being daytime-only radio stations that completely lose coverage after sunset hours depriving their communities of service.

Recent actions from the Commission permitting use of FM Translators to provide fill-in coverage from translators have breathed new life into local community radio outlets in being able to provide predictable, uninterrupted coverage. While the use of FM Translators to revitalize the AM Broadcast band may not be the ultimate long-term goal of the Commission, the use of these translators has provided a critical component to the very survival of smaller radio broadcasters relying on reliable, 24-hour coverage for their local communities.

A material risk exists for broadcasters providing nighttime service utilizing Fill-in translators. With the current regulations, broadcasters are subject to potentially arbitrary complaints of interference that could severely imperil their ability to serve their communities.

GMC is emphatically putting support behind recent comments and studies regarding modernization of FM Translators rules to provide reasonable limits on protection against translator interference to full-power radio facilities. Specifically, GMC believes comments filed by Wilkins[1] regarding this proceeding provide a reasonable balance:

It is recognized that FM stations provide service beyond their defined, protected contours due to variations in terrain among other factors. Therefore, we propose that, for the purpose of interference complaints, the protected FCC (50:50) contours of full power stations be extended by a 6 dB buffer. Thus, translator interference complaints in areas beyond the 54 dBu for class AC stations, the 51 dBu for B1s and the 48 dBu for class B stations would not be recognized.

We see this as a reasonable balance between protecting the additional coverage of existing full-power stations beyond their FCC (50,50) protected contours and providing service to communities on a reliable basis that rely on FM Translators to extend coverage due to nighttime AM radio skywave interference.

Brian P. McGlynn
President, Genesee Media Corporation
May 18, 2017

REFERENCES

[1] Wilkins Parent Corporation, and its affiliates, Reply Comments in FCC Proceeding 11786 on Protect Local Radio Service Provided by Fill-In Area FM Translators RM, May 18, 2017.